

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

## Air Compliance Inspection Report

Photos at: G:\AIR-5\Misc\Inspections\Photos\FY 2012\Clark 3-12

### Inspected Facility

Kinder Morgan Las Vegas Terminal  
5049 North Sloan Lane  
Las Vegas, NV 89115  
702-644-3943

### Inspection Date

03/08/12

### Inspectors

John Brock (USEPA, lead)  
Shibi Paul, Scott Jelinek, and Mike Doyle; Clark County DAQ

### Facility Representative

Vern Lacro, Area Manager

### Background/History

This inspection was performed in conjunction with EPA Region 9's Air Toxics Training provided to Clark County on March 6-7, 2012.

The facility is subject to its Title V permit. It was built in the 1960s and occupies about 40 acres. This bulk distribution terminal has loading racks to dispense fuel into tanker trucks. Only Racks 1-7 were in the original footprint.

### Narrative

We arrived at Kinder Morgan at around 1:30 PM, introduced ourselves, showed our credentials, and explained the purpose of our visit during our opening conference. We received permission to take pictures as long as they did not show the name Kinder Morgan. No special personal protective equipment was required during the inspection. We asked Mr. Lacro to describe the facility and the processes.

The facility has two inbound pipelines (14" and 8" diameter) fed by refineries in Southern California. There is an outbound pipeline to Nellis Air Force Base that only carries JP-8 jet fuel. The facility currently has an average throughput of about 40,000 barrels a day of refined products. This is down from approximately 70,000 barrels per day a few years ago. Ethanol comes in via railcars. They can off-load eight railcars at a time. Ethanol is injected at the loading rack along with other additives.

A card lock system is employed to control loading and to certify the tanker receiving product has passed its annual tightness test. The vapors generated at the loading racks are collected by a separate line and are sent to a carbon bed for reclamation. This represents LAER, which was required to settle a previous EPA lawsuit. The carbon bed collects about 600 barrels per month, which is rebled with other gasoline.

A walk-through is performed by on-site staff daily for visual inspection of leaks and other potential problems.

After the opening conference, we proceeded to do an inspection of the facility. There is no vapor collection at the 39 storage tanks. Vapors collected at the loading racks goes to the carbon bed. The John Zink vapor recovery system has two carbon beds. One is controlling vapors while the other is regenerated. A flare serves as the back up to the carbon bed. An infrared flame detector monitors the flare to ensure a flame is present when vapors are routed to it.

Kinder Morgan also operates pig receivers and launchers. These pigs are designed to clean and inspect the pipeline. This is accomplished by inserting the pig into a pig launcher - a funnel shaped Y section in the pipeline. The launcher is then closed and the pressure of the product in the pipeline is used to push it down the pipe until it reaches the pig receiver.

Transmix, the cross contaminated material created between two different products flowing through the pipeline, is collected in a separate tank and is handled by their customers.

During the facility inspection we noted the numbers from the two tankers being filled at the loading rack. We asked for the records of the tightness testing for these tankers when we got back to the office.

### **Records Inspection**

We returned to the office to check the facilities records. They had the pressure decay test records for the two tankers we observed being loaded. The CEMS for the vapor processing unit exhaust read 0.302 mg VOC/liter of gasoline loaded, well less than the limit.

This facility is not subject to 40 CFR 63 Subpart R because it is not a major source for HAPs. It is major for VOCs.

### **Closing Conference**

We had a brief closing conference. We thanked them for their cooperation.

## **ENFORCEMENT CONFIDENTIAL**

### **Compliance Concerns**

None. They appear to be in compliance with all their Title V permit conditions, including NESHAP BBBB, the area source gasoline distribution standard.